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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

American Farm Bureau Federation, Wyoming Farm
Bureau Federation, Natrona County Farm & Ranch
Bureau, American Exploration & Mining Association,
American Forest Resource Council, American
Petroleum Institute, American Sheep Industry
Association, National Cattlemen's Beef Association,
National Mining Association, National Rural Electric
Cooperative Association, Public Lands Council, and
Western Energy Alliance,

Plaintiffs,

v.

United States Department of the Interior; United States
Bureau of Land Management; Debra Haaland in her
official capacity as Secretary of the Interior; Steve
Feldgus in his official capacity as Principal Deputy
Assistant Secretary of the Interior; and Tracy Stone-
Manning in her official capacity as the Director of the
Bureau of Land Management,

Defendants.

No. 2:24-cv-136-ABJ

**PLAINTIFFS' STATEMENT OF CONSENT
TO TRANSFER OF VENUE**

On September 6, 2024, defendants filed a motion to transfer this case to the District of Utah (Dkt. 16), where a closely related suit against the same defendants is pending, commenced by the States of Utah and Wyoming. *See Utah v. Haaland*, No. 2:24-cv-438 (D. Utah). Plaintiffs have consented to transfer for the reasons stated in the government's motion and supporting

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EXHIBIT 2

memorandum of law. They are national and regional trade associations whose members operate all throughout the American West, including in both Wyoming and Utah. Although venue is proper in this District, it also is proper in the District of Utah, where this lawsuit could have been initiated pursuant to 28 U.S.C. § 1391(e). Moreover, plaintiffs agree with the government that this case can be litigated and resolved relatively more efficiently if it is transferred to the District of Utah and consolidated (or considered in close coordination) with the pending suit brought by the States of Wyoming and Utah. There are overlapping claims in the two cases, and we anticipate that the administrative record will be the same or very similar. Thus, transferring this case to the District of Utah would serve judicial economy.

Because the upside of transfer is the ability to closely coordinate the two cases, plaintiffs respectfully join the government's request that the motion be resolved expeditiously so that the schedules for briefing and argument may be aligned. *See* Dkt. 16, at 1.¹

Dated: 9 September 2024.

BY:



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¹ In consenting to transfer of this case to the District of Utah, plaintiffs take no position on the separate motion to transfer pending in *North Dakota, et al. v. U.S. Department of the Interior*, No. 1:24-cv-124 (D.N.D.), which involves sovereign rather than private interests.